

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,

Plaintiffs,

v.

ANDREA CABRAL, SUFFOLK COUNTY  
SHERIFF'S DEPARTMENT, SUFFOLK  
COUNTY, and CORRECTIONAL  
MEDICAL SERVICES, INC.,

Defendants.

**Civil Action No. 04-11935-DPW**

**ASSENTED TO MOTION  
OF  
THE FEDERAL BUREAU OF INVESTIGATION  
AND  
THE UNITED STATES ATTORNEY'S OFFICE  
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION TO COMPEL**

The Respondents, Federal Bureau of Investigation (FBI) and the United States Attorney's Office (USAO), respectfully move for an extension of time until September 16, 2005, to respond to the Plaintiff's Motion to Compel Testimony and Documents From the FBI and the USAO. Good cause exists for this Motion.

Due to mail handling problems counsel for the Respondents did not receive a full copy of Plaintiff's Motion to Compel until August 31, 2005. Further, Counsel for the Plaintiff's and undersigned counsel have conferred and are exploring the possibility of resolving Plaintiff's information and testimony requests without further litigation. The additional time will allow for more thorough evaluation and discussion. Plaintiff's counsel has assented to this Motion.

This Motion is made in good faith and is not made to delay the action, or for any other improper purpose. Therefore, the United States respectfully request that the Court grant this Motion and approve the proposed extension of time for the United States to file its response until September 16, 2005.

Respectfully submitted,

UNITED STATES OF AMERICA

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Anton P. Giedt 9/1/05  
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**LOCAL RULE 7.1(A)(2) CERTIFICATION**

Undersigned counsel certifies that pursuant to the requirements under Local Rule 7.1(A)(2), he has conferred with Plaintiff's counsel of record and that Plaintiff's counsel has assented to this motion.

/s/ Anton P. Giedt  
Anton P. Giedt  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

Suffolk, ss.

Boston, Massachusetts  
DATE: September 1, 2005

I, Anton P. Giedt, Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing upon counsel of record through electronic filing and by first class mail.

/s/ Anton P. Giedt  
Anton P. Giedt  
Assistant U.S. Attorney

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